

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**ROGELIO ORTEGA HERNANDEZ,**  
**on behalf of himself and others similarly**  
**situated,**

**Plaintiff,**

**v.**

**EARTH CARE, INC., SCOTT RISBON,**  
**and KIM RISBON,**

**Defendants.**

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**CIVIL ACTION NO. 15-cv-5091-GJP**

**JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT**


The parties in the above-captioned matter, by and through their undersigned counsel, hereby respectfully request that this honorable court approve as fair and reasonable the settlement agreement appended hereto as Exhibit 1.

As previously discussed with the court, the parties have negotiated a confidential annex to the settlement agreement. See Exhibit 2. The annex contains anti-retaliation provisions and identifies an employee by name. To maintain the anonymity of this employee, the parties request that the annex not be made part of the record. Instead, the parties are submitting a courtesy copy of the annex to Chambers.

**COHEN SEGLIAS PALLAS  
GREENHALL & FURMAN, P.C.**

**FRIENDS OF FARMWORKERS**

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Dated: April 4, 2016

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